

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROCKEFELLER BROTHERS FUND,  
ROCKEFELLER FAMILY FUND, INC. and  
MICHAEL NORTHROP,

Movants,

-against-

EXXON MOBIL CORPORATION,

Respondent

EXXON MOBIL CORPORATION,

Plaintiff,

-against-

ERIC TRADD SCHNEIDERMAN, Attorney  
General of New York, in his official capacity,  
and MAURA TRACY HEALEY, Attorney  
General of Massachusetts, in her official  
capacity,

Defendants.

No. 1:16-mc-00455-P1

No. 4:16-CV-469-K in the United  
States District Court for the Northern  
District of Texas

USDC SDNY  
DOCUMENT  
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**STIPULATION AND [PROPOSED] ORDER REGARDING MOTION TO QUASH**

WHEREAS, Exxon Mobil Corporation (“Exxon Mobil”) commenced an action in the Northern District of Texas captioned *Exxon Mobil Corp. v. Schneiderman*, No. 4:16-CV-469-K (N.D. Tex.) (the “Texas Action”);

WHEREAS, in connection with the Texas Action, Exxon Mobil issued subpoenas for documents (the “Subpoenas”) to non-parties Rockefeller Brothers Fund, Rockefeller Family Fund, Inc. (together, the “Funds”), and Michael Northrop on November 9, 2016;

WHEREAS, the Funds and Mr. Northrop served objections and responses to the Subpoenas on November 23, 2016;

WHEREAS, the Funds and Mr. Northrop filed a motion to quash the Subpoenas in this Court on December 9, 2016, ECF Nos. 1-6 (the “Motion to Quash”);

WHEREAS, on December 15, 2016, an order was issued in the Texas Action staying of all discovery pending further order from that Court (the "Discovery Stay");

IT IS HEREBY STIPULATED AND AGREED, by and among the Funds, Mr. Northrop, and Exxon Mobil, through their respective counsel, that proceedings related to the Motion to Quash are stayed while the Discovery Stay or any discovery stay that may be ordered by the United States Court of Appeals for the Fifth Circuit remains in effect;

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be signed in counterparts, and scanned or facsimile signatures of this Stipulation shall have the same force and effect as original signatures.

Dated: New York, New York  
December 16, 2016

PATTERSON BELKNAP WEBB &  
TYLER LLP

By: 

Harry Sandick  
Stephanie Teplin  
1133 Avenue of the Americas  
New York, NY 10036-6710  
Tel.: (212) 336-2723  
Fax: (212) 336-1215  
hsandick@pbwt.com  
steplin@pbwt.com  
*Attorneys for the Rockefeller Brothers  
Fund, Rockefeller Family Fund, and  
Michael Northrop*

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON, LLP

By: 

Theodore V. Wells, Jr.  
Michele Hirshman  
Daniel J. Toal  
Justin Anderson  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Tel.: (212) 373-3000  
Fax: (212) 757-3990  
twells@paulweiss.com  
mhirshman@paulweiss.com  
dtoal@paulweiss.com  
janderson@paulweiss.com  
*Attorneys for Exxon Mobil Corporation*

SO ORDERED:

SIGNED this 16th day of December, 2016



KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE  
SITTING IN PART I